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## FOR THE NORTHERN DISTRICT OF OHIOERN DISTRICT OHIOERN

UNITED STATES OF AMERICA,	) <u>INDICTMENT</u>
Plaintiff,	JUDGE ADAMS
v.	) case no. 1 : 18 CR 374
	Title 21, Sections 841(a)(1),
WALTER D. BROWN, JR.,	(b)(1)(C) and 853, United States
	) Code
Defendant.	

## COUNT 1

(Distribution of Heroin, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury charges:

1. On or about January 18, 2018, in the Northern District of Ohio, Eastern Division, Defendant WALTER D. BROWN, JR. did knowingly and intentionally distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

## **FORFEITURE**

The Grand Jury further charges:

2. For the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853, the allegation of Count 1, is incorporated herein by reference. As a result of the foregoing offense, Defendant WALTER D. BROWN, JR. shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of

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such violation; any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.